

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

NO. 1:24-cv-13233-GAO

SHANA COTTONE,

Plaintiff,

v.

CITY OF BOSTON, by and Through Its
Treasurer, Ashley Groffenberger, and
MICHELLE WU,

Defendants.

**JOINT MOTION OF THE PARTIES FOR AN ENLARGEMENT OF TIME
TO RESPOND TO PLAINTIFF’S COMPLAINT**

Pursuant to Fed. R. Civ. P. 6(b), Defendants City of Boston (the “City”) and Michelle Wu, along with Plaintiff Shana Cottone, jointly move this Honorable Court to enlarge the time for Defendants to respond to Plaintiff’s Complaint by twenty (“20”) days, up to and including June 3, 2025. As grounds for this Motion, the Parties state as follows:

1. Plaintiff filed her Complaint on December 31, 2024.
2. On May 6, 2025, this Court granted Defendants’ motion to extend the response deadline by two weeks. (ECF No. 10). As defense counsel explained in that motion (ECF No. 9), Plaintiff’s counsel informed defense counsel that he soon intends to file a motion to amend the complaint. The parties agreed that in lieu of filing motions to dismiss, Defendants would move the court to extend the response deadline an additional two weeks to give Plaintiff time to complete the

motion to amend and amended complaint. Defendants will not oppose the motion to amend when it is filed.

3. The current due date for the response is May 14, 2025.
4. In early May, a number of issues arose in a case pending in other jurisdiction that has required the attention of Plaintiff's counsel. As a result, he has been unable to focus his attention on completing a motion to amend and a proposed amended complaint. The parties anticipate that an additional twenty ("20") days will be sufficient time for Plaintiff's counsel to complete and file with the Court the motion and proposed amended complaint.

WHEREFORE, the parties respectfully request that this Motion be allowed and that Defendants be granted an extension of time, up to and including June 3, 2025, to respond to the Complaint in this matter.

Respectfully submitted,

Defendants
CITY OF BOSTON AND MICHELLE WU

By their attorneys,

Adam Cederbaum
Corporation Counsel

/s/ Randall Maas
Randall Maas BBO# 684832
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Plaintiff
SHANA COTTONE

By her attorney,

Mark P. Gagliardi (BBO# 657622)
/s/Mark P. Gagliardi

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on May 14, 2025.

May 14, 2025

Date

/s/ *Randall F. Maas*

Randall F. Maas

RULE 7.1 CERTIFICATION

I, Randall F. Maas, hereby certify that I conferred with Plaintiff's counsel about the relief requested herein by email on May 14, 2025, and that Plaintiff's counsel assented to the motion for a twenty-day extension.

/s/ *Randall F. Maas*

Randall F. Maas